

To: Schaaf, Eric[Schaaf.Eric@epa.gov]; Fajardo, Juan[Fajardo.Juan@epa.gov]
Cc: Flanagan, Sarah[Flanagan.Sarah@epa.gov]; Wilson, Eric[Wilson.EricJ@epa.gov]; Jones, Kristin[Kristin.Jones@newellco.com]; Rodriguez, Gabriel M.[grodriguez@schiffhardin.com]; Joshi, Bina[BJoshi@schiffhardin.com]
From: Sawula, Andrew N.
Sent: Wed 4/19/2017 6:34:51 PM
Subject: Passaic Settlement Correspondence
[removed.txt](#)
[Berol 4-19-17 Ltr to EPA re Cash Out Settlement.PDF](#)

Settlement Confidential – FRE 408

Mr. Schaaf and Mr. Fajardo:

Please see the attached letter, asking that EPA reconsider its decision to exclude Berol Corporation from the current settlement. EPA has not alleged (and there is no reason to believe) that Berol is associated with the disposal or release of any of the contaminants of concern identified in the OU2 ROD. As such, it fits squarely within the criteria EPA has stated it used to identify parties eligible for this round of cash out settlements.

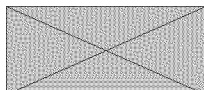
If EPA will not consider Berol for settlement in this round, we would appreciate the opportunity to further discuss this with you at your earliest convenience.

Sincerely,

Andy Sawula

Andrew N. Sawula
Partner

[vCard](#)
[View Bio](#)



Schiff Hardin LLP
One Westminster Place
Suite 200
Lake Forest, IL 60045

t 847.295.4336
f 847.295.7810
e asawula@schiffhardin.com
w schiffhardin.com

This message and any attachments may contain confidential information protected by the attorney-client or other privilege. If you believe that it has been sent to you in error, please reply to the sender that you received the message in error. Then delete it. Thank you.
